



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH NEAL SANBERG,

Defendant.

CR No. 25-00200 (A) -SVW

F I R S T  
S U P E R S E D I N G  
I N F O R M A T I O N

[18 U.S.C. § 1343: Wire Fraud; 18  
U.S.C. § 981(a)(1)(C) and 28  
U.S.C. § 2461(c): Criminal  
Forfeiture]

The Acting United States Attorney charges:

COUNTS ONE AND TWO

[18 U.S.C. §§ 1343, 2]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant JOSEPH NEAL SANBERG was a resident of Los Angeles and Orange, California and a co-founder and shareholder of Company A.

2. Company A maintained its principal office in Los Angeles County, California. Defendant SANBERG was Company A's largest shareholder, and at various times served on Company A's board of directors.

3. Employee 1 was a resident of Arizona and was an Officer of Company A.

1           4.     Co-Schemer Ibrahim Ameen AlHusseini was a resident of Los  
2 Angeles, California. Co-Schemer AlHusseini served on the board of  
3 directors of Company A.

4           5.     Individual 1 was a resident of Florida.

5     B.     THE SCHEME TO DEFRAUD

6           6.     Beginning no later than in or about January 2020, and  
7 continuing through in or about February 2025, in Los Angeles and  
8 Orange Counties, within the Central District of California, and  
9 elsewhere, defendant SANBERG, together with others known and unknown,  
10 each aiding and abetting one another, knowingly and with intent to  
11 defraud, devised, participated in, and executed a scheme to defraud  
12 lenders and investors, and to obtain money and property from those  
13 lenders and investors by means of material false and fraudulent  
14 pretenses, representations, and promises, and the concealment of  
15 material facts.

16          7.     The scheme operated, in substance, as follows:

17           a.     Defendant SANBERG, together with others known and  
18 unknown, sent and caused to be sent to prospective and current  
19 lenders and investors materially false and fraudulent  
20 representations, including about defendant SANBERG's assets; Company  
21 A's revenue, debt, available cash, and valuation; and Co-Schemer  
22 AlHusseini's assets.

23           b.     Defendant SANBERG made and caused to be made the  
24 materially false and fraudulent representations to prospective  
25 lenders to get the prospective lenders to provide him loans for his  
26 own benefit.

27           c.     At times, after the loan or investment was secured,  
28 defendant SANBERG continued to send and cause to be sent materially

1 false and fraudulent representations or purported dividend payments  
2 to lull the lenders and investors into a sense of security regarding  
3 the loan or investment.

4 d. Defendant SANBERG also made and caused to be made the  
5 materially false and fraudulent representations regarding the  
6 financial health of Company A to prospective investors to induce the  
7 prospective investors to (i) directly invest in Company A;  
8 (ii) purchase defendant SANBERG's personally held shares of Company  
9 A; and (iii) pool investments to purchase debt of Company A.

10 e. Based on the materially false and fraudulent  
11 representations regarding the financial health of defendant SANBERG,  
12 Co-Schemer AlHusseini, and Company A, prospective lenders provided  
13 defendant SANBERG loans and prospective investors invested in Company  
14 A.

15 8. As a result of defendant SANBERG's scheme to defraud,  
16 between approximately January 2020 and February 2025, defendant  
17 SANBERG, together with others known and unknown, secured at least  
18 approximately \$248,303,886 in loans and investments that were  
19 disbursed to Company A and defendant SANBERG based on the false and  
20 fraudulent statements, representations, and promises defendant  
21 SANBERG had sent or caused to be sent.

22 C. USE OF THE WIRES

23 9. On or about the dates set forth below, in Los Angeles and  
24 Orange Counties, within the Central District of California, and  
25 elsewhere, defendant SANBERG, and others known and unknown, each  
26 aiding and abetting one another, for the purpose of executing the  
27 above-described scheme to defraud, transmitted and caused the  
28

transmission of the following items by means of wire communications  
in interstate commerce:

COUNT	DATE	INTERSTATE WIRE TRANSMISSION
ONE	3/21/2022	Submission of a message from defendant SANBERG's phone in the Central District of California to Employee 1 in Arizona that stated that money sent to Company A should be credited as revenue to Company A from a purported customer
TWO	6/5/2024	Submission of an electronic letter from within the Central District of California to Individual 1 in Florida that falsely stated that Company A had "a balance of cash and equivalents of at least \$250,000,000"

FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of the offenses set forth in either of Counts One or Two of this First Superseding Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses; and

(b) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

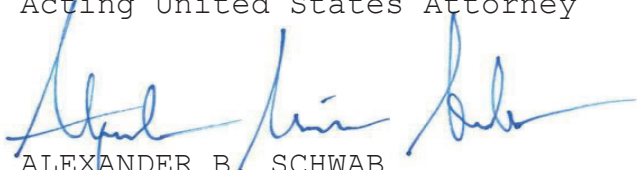
3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the value of the property described in the preceding paragraph if, as the result of any act or omission of the defendant, the property described in the preceding paragraph or any portion thereof (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been

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1 substantially diminished in value; or (e) has been commingled with  
2 other property that cannot be divided without difficulty.

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